

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

DISTRICT OF NH  
CLERK

Frank Staples, et al.,  
Plaintiffs,

v.

Christopher Sununu, Governor, et al.,  
Defendants.

Civil No. 1:24-cv-00331-LM-TSM

2025 MAR 24 P 8:16

24 HOUR DEPOSITORY

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PLAINTIFFS' REPLY TO DEFENDANTS' PARTIAL OBJECTION TO MOTION FOR  
EXTENSION OF TIME (ECF NO. 28)

NOW COME the Plaintiffs, Frank Staples and Kathleen Boussier, pro se, and respectfully submit this short reply to the Defendants' Partial Objection to Plaintiffs' Motion for Extension of Time (ECF No. 28).

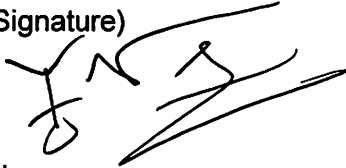
1. Defendants do not object to Plaintiffs' request for additional time, and Plaintiffs appreciate that acknowledgment.
2. However, Plaintiffs respectfully object to Defendants' request that the Court disregard or decline to reach the issue of Plaintiff Frank Staples' ADA-related request for accommodation.
3. Plaintiff Frank Staples is a pro se litigant who suffers from cognitive limitations, including head trauma, which can affect his ability to fully consolidate arguments or filings. This disability is documented and will be further addressed in a forthcoming formal ADA Notice and affidavit.
4. Plaintiff has made good faith efforts to avoid duplicative filings, but some overlap may occur due to the nature of his condition. Plaintiffs respectfully request that the Court view all filings holistically, and recognize that any redundancy is a reflection of genuine effort to comply with procedural rules—not willful duplication.
5. While Plaintiffs understand that the Court may not need to formally resolve the ADA issue to rule on the pending motion for extension, they ask that the Court acknowledge the existence of the request, and permit the pro se Plaintiffs appropriate latitude under the circumstances.

WHEREFORE, Plaintiffs respectfully request that the Court grant the requested extension in full, and in doing so, acknowledge that Plaintiff Staples has raised an ADA accommodation issue that will be more formally presented shortly, and should not be construed as waived or withdrawn.

Respectfully submitted,

/s/ Frank Staples (Electronic Signature)

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/s/ Kathleen Bussiere (Electronic Signature)

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Dated: March 24, 2025

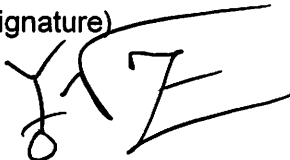
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#### CERTIFICATE OF SERVICE

I hereby certify that on this March 21, 2025, a true and correct copy of the foregoing Plaintiffs' Notice of Discovery Requests, along with Exhibit A, was filed electronically via the Court's CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Frank Staples (Electronic Signature)

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Dated: March 24, 2025